RESPONSE TO COMMENTS

A draft National Pollutant Discharge Elimination System (NPDES) permit for the City of Wapato, Washington municipal sewage treatment facility was issued for public notice on January 26, 1998. The Public Notice initiated a 30-day public comment period. EPA received comment from Edna Mauch, Mayor, City of Wapato, in a letter dated February 24, 1998. No other comments were received. The following summarizes the substantive comments and EPA's response.

Comment. Discharge Location. The commentor stated that the discharge latitude location of 46°22'67" was incorrect and that the correct latitude is 46°25'59".

Response. EPA agrees that this is an error and will incorporate the correct latitude of 46°25'59" into the final permit.

Comment. Effluent Limitations. The commentor stated that the interim total residual chlorine limit of 0.5 mg/L is too low to effectively and consistently comply with the fecal coliform effluent limit, and believes a higher interim total residual chlorine effluent limit is justified. The commentor requested using the 90th percentile of existing total residual chlorine data in lieu of best professional judgement to establish the chlorine limit, as was done in the Toppenish, Washington NPDES permit.

Response. The interim total residual chlorine limit of 0.5 mg/L is a technology-based limit that allows a **typical** wastewater treatment plant to achieve adequate disinfection and meet the average monthly fecal coliform limit of 100 colonies/100 mL. In the Toppenish permit, the facility is required to meet this technology-based limitation during the non-irrigation season. During the irrigation season, however, they were given a performance-based limit at the 90th percentile of existing total residual chlorine data because they target a low level of total coliform (2.2 organisms/100 mL). This fecal target is based on a guideline for spray irrigation of food crops with treated wastewater which is contained in the document *Guidelines for Land Disposal of Treated Domestic Sewage Effluent in Washington State* (1990), issued jointly by Washington Department of Ecology and Department of Health.

The current permit revealed that the Wapato facility was also targeting this low level of total coliform. After further research into this issue, however, it was discovered that this low level of total coliform was for land reclamation and since the facility's effluent is not being applied to land reclamation areas, this low level of total coliform is not necessary. In a more recent publication *Design Criteria for Municipal Wastewater Land Treatment Systems for Public Health Protection* (February 1994), issued by the Washington Department of Health, the minimum requirement for land treatment systems shall be wastewater meeting the definition of "disinfected wastewater", which means "wastewater in which pathogenic organisms have been controlled by chemical, physical or biological means and for the purposes of land treatment, no more than 200 Fecal Coliform per 100 milliliters in any one sample (based on a minimum of

weekly sampling) as determined at the entry point to the irrigation system on the land treatment site." Since the fecal coliform limits to be obtained by the permittee can be met through adequate use of the treatment technology available at the facility, the interim total residual chlorine limit will remain at 0.5 mg/L.

Comment. Ammonia Effluent Limitation. The commentor stated that the proposed ammonia limitation of 11.0 mg/L was based upon limited data and requests that either a limit be established after two years of data collection with no limit set at this time, or that the ammonia limit be increased to greater than 11.0 mg/L.

Response. EPA agrees that the proposed ammonia limitation was based upon limited data. (The draft permit gave the permittee an average monthly performance-based limit of 11.0 mg/L based on the 95th percentile of eight data points and no daily maximum limit). It was the intention of the permit writer to allow a higher performance-based limit while the facility monitored the receiving water to gather enough data to establish limits in the next permit. After reviewing the data currently available for ammonia, the permit writer has decided to established a tiered permit limit for ammonia. Even though there was not enough ammonia data to calculate a coefficient of variation (CV), a default CV of 0.6 was used to calculate the effluent limits (using a CV value of 0.6 gives a conservative estimate and assumes relatively high variability).

Ammonia criteria is based on pH and temperature. Since the temperature and pH of the receiving water during the non-irrigation season is that of the effluent, there was adequate data to compute ammonia limitations during the non-irrigation season (November 1 through March 31). Using only the data from November 1 through March 31 for the past five years, a pH of 7.0 based on the average of the data and a temperature of 16.4 °C based on the 95th percentile of the data was used to calculate water quality-based limits for ammonia during the non-irrigation season. The average pH was used in lieu of the 95th percentile because the permittee is currently upgrading the facility and better control of pH is possible. These limits will be re-evaluated during the next round of permitting using the 95th percentile of the pH data collected during this permit. Since there is a minimal confidence level in the temperature and pH data for the receiving water during the irrigation season (April 1 through October 31), no limit will be established at this time.

The effluent limitations for ammonia will be as follows: No limitation during the irrigation season (April 1 through October 31); a daily maximum limit of 16 mg/L and a monthly average limit of 8.2 mg/L during the non-irrigation season (November 1 through March 31). The facility was notified of the non-irrigation season limits and did not request a compliance schedule to meet these limits, thus the limits will be effective on the issuance date of the final permit. If the facility later finds that they cannot comply with the limits, a compliance schedule can be implemented through a compliance order.

Comment. Effluent Monitoring Requirements (Table 3). The commentor stated that the facility only has an influent flow monitor and does not currently have an effluent flow monitor, but plans

to install one as part of the disinfection system improvements. The commentor requested the removal of the effluent monitoring requirement for flow and incorporation of the effluent flow monitor into the Compliance Schedule in Section I.D. of the permit.

Response. EPA agrees that the permittee can use the influent flow monitor to determine if they are in compliance with their reporting and percent removal requirements. The installation of the effluent monitor shall be part of the disinfection system improvements, although this requirement is not explicitly stated in the permit.

Comment. Schedule of Compliance. The commentor stated that, to clarify the reporting requirements, the phrase "for chlorine effluent limitations" should be added to the first sentence of the reporting requirement within the Schedule of Compliance (page 8) to read as follows:

> The permittee shall notify the Director and the Yakama Nation, in writing, of its compliance or noncompliance with the interim or final requirements for chlorine effluent limitations. (underlined added)

Response. EPA agrees with this comment and will change the final permit accordingly.

Comment. Quality Assurance Requirements. The commentor stated that the facility does not currently have a Quality Assurance Plan (QAP) and requests 180 days in lieu of 90 days to complete the QAP due to current construction at the facility.

Response. EPA agrees with this comment and will change the final permit accordingly.

Comment. Biosolids Treatment Requirements (Table 5). The commentor states that, for pathogen reduction under aerobic conditions, the MCRT should be "greater than 60 days at 15 °C" rather than "less than 60 days at 15 °C" as expressed in the draft permit.

Response. In Appendix B to Part 503 Section A.1., the pathogen reduction criteria for aerobic conditions states that "Values for the [MCRT] and temperature shall be between 40 days at 20 degrees Celsius and 60 days at 15 degrees Celsius." Therefore, the draft permit was correct that MCRT should be "less than 60 days at 15 °C." The final permit, however, will be modified to better reflect this statement as follows: "40 days @ 20°C<MCRT & T<60 days @ 15°C."

Comment. Biosolids Treatment Requirements (Table 5). The commentor states that footnote 3 of table 5 in the draft permit provides only some alternative methods of meeting the 40 CFR 503 requirements for vector control and requests that the alternative methods include 40 CFR 503.33(b)(3), (4) and (7).

Response. EPA included the methods from 40 CFR 503.33(b) that the facility could meet with their current equipment and procedures. The facility was contacted and requested to submit the type of equipment and procedures they would use to comply with the alternative methods in 40

CFR 503.33(b)(3), (4) and (7). While the facility agrees that they do not have the equipment to perform the testing requirements of 40 CFR 503.33(b)(3) and (4), they do have testing equipment to determine if the percent of solids is 75 percent or greater. Therefore, EPA agrees to include alternative method 40 CFR 503.33(b)(7) in the final permit.

Comment. Biosolids Notification Publication. The commentor states that publication of a new sludge application site in the *Wapato Independent* (a Wapato local newspaper) would be more appropriate than publication in the *Community Core* (a Selah area local newspaper).

Response. The intent of the public notice of new sludge application sites is to let the public in the surrounding vicinity to that site know that this practice is proposed to take place and allow them to comment on the activity. It was the intent of the permit writer to include one newspaper from each county where land application is proposed to take place that would ensure that the public in those areas were aware that this practice will be taking place in their vicinity. This is a minimum requirement and public notice in other newspapers is allowed. After further review, EPA believes this requirement is better stated as "the permittee shall public notice in a local newspaper in the county where land application is to take place" rather than include specific newspapers in the permit. This would allow the permittee more flexibility and less expense in notifying the public of their intent to land apply in a particular area. However, the permittee will still be required to public notice each time in the *Yakima Herald Republic*. This change will be incorporated into the final permit.

Comment. Activity. The commentor states that the current instantaneous peak flow design to be 2.5 MGD rather than 2.3 MGD as specified in the Fact Sheet.

Response. EPA agrees with this comment, however, the Fact Sheet is a final document and will not be re-issued with the final permit. Therefore, this response serves as acknowledgment of the change in the instantaneous peak flow design to 2.5 MGD.